

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)	
)	
Distribution of)	CONSOLIDATED DOCKET NO.
Cable Royalty Funds)	14-CRB-0010-CD/SD
)	(2010-2013)
In the Matter of)	
)	
Distribution of)	
Satellite Royalty Funds)	

**MULTIGROUP CLAIMANTS' OPPOSITION TO STEVEN SOULE'S
MOTION TO INTERVENE AND DELAY ANY DISTRIBUTION TO
MULTIGROUP CLAIMANTS OR WORLDWIDE SUBSIDY GROUP, LLC**

Movant Steven Soule' submits a motion to intervene in this proceeding, and to delay any distributions to Multigroup Claimants, on the grounds that "he needs" sixty days to complete an investigation into whether a non-party, former owner of Multigroup Claimants "may" have not properly disclosed assets that were the part of the former owner's May 2019 bankruptcy. The only stated basis for the motion is that "[t]he debtor [Alfred Galaz] has not responded to multiple attempts to contact him about this matter."¹

¹ Why Mr. Soule's contact with non-party Alfred Galaz should even matter to this proceeding is not explained. Notwithstanding, Mr. Galaz was formally represented

The earliest final distribution order in this proceeding was issued on July 18, 2018, i.e., seven months following Alfred Galaz's divestment of Multigroup Claimants. Appeals to the Court of Appeals were not exhausted until December 6, 2019, i.e., two years after Alfred Galaz's divestment of Multigroup Claimants, and no more proceedings are scheduled. All that remains is for royalties in this proceeding to be distributed.

A. Being a *potential* creditor is not a basis for intervention in a near-completed proceeding, nor a basis to delay distribution, nor a basis to delay distribution of amounts that dwarf the alleged *potential* liability.

Mr. Soule' presents himself as nothing more than a *potential* creditor, and such is not a basis by which a party may intervene in a near-completed proceeding, much less request the Judges to "freeze" or delay distribution to Multigroup Claimants. Moreover, Mr. Soule' presents himself as a court-appointed bankruptcy trustee, and in such capacity has a panoply of viable options available which he has purposely not pursued, e.g., motion to bankruptcy court to secure funds. Instead, he has sought to throw a wrench into the machinery of this by bankruptcy legal counsel and was *never* contacted by Mr. Soule except by a letter that was sent directly to Mr. Galaz (in violation of the rules of direct contact with represented parties), and then several days after Mr. Galaz's bankruptcy case had already been reopened. Decl. of Alfred Galaz.

proceeding in order to stall payments that are already long overdue. Most significantly, Mr. Soule' fails to mention in his pleading that the *aggregate* of his *potential* interest could only be for the amount discharged in Alfred Galaz's bankruptcy, i.e., the sum of \$65,815. Notwithstanding, he seeks to delay distribution of amounts that are conservatively one-hundred times that value.

Much is required to be said about the nature and timing of Mr. Soule's motion. As noted in prior filings by Multigroup Claimants, the undersigned was one of several thousand U.S. citizens stranded in Peru during the initial Coronavirus outbreak. Initially, the Peruvian government imposed a prohibition on U.S. citizens from returning until at least April 1, then after diplomatic wrangling by the U.S. State Department, the undersigned was able to return on March 29, 2020. During such time in Peru, communication was only reliably by email, and even then was sporadic.

The undersigned's first contact from Mr. Soule' was via a letter emailed by Mr. Soule' on March 17, 2020, pursuant to which Mr. Soule' indicated that he "may" have an interest in this proceeding. **Exhibit A.** That letter was first received on March 18, 2020. The undersigned promptly responded by email, explained the circumstances of his limited ability to communicate, and requested

that any formal action (if being considered) be withheld until they had an opportunity to speak. The undersigned further asked Mr. Soule' what the basis of his potential interest may be. On Friday, March 20, 2020, the undersigned was informed the following by Mr. Soule':

“Brian-Thank you for the email. Good luck getting back into the country. I will hold off on any formal action until we have had a chance to talk. Steve”

See **Exhibit B**.

Notwithstanding Mr. Soule's assurance to not take formal action, on Monday, March 23, 2020, i.e., the *very next business day*, and without any notice to Multigroup Claimants, the undersigned, or Alfred Galaz, the U.S. Bankruptcy Trustee took formal action to re-open Alfred Galaz's bankruptcy case. Therafter, Mr. Soule' filed the instant motion on March 27, 2020, again without advance notice to Multigroup Claimants, without explanation, and in a direct contradiction of his assurance on March 20, 2020 to not take formal action.

Upon the undersigned's return to the U.S., Mr. Soule' was promptly contacted, and multiple issues addressed, one of which is the zeal by which SDC counsel Matthew MacLean has sought out Mr. Soule' on *multiple* occasions, and made numerous false, unsubstantiated allegations for no purpose other than to inject strife into the life of a former owner of Multigroup Claimants, an 85-year old

man in failing health. As the Judges may recall, Mr. MacLean's rationalization for his malicious acts is that he has "taken an oath to do no falsehood".

Based *only* on Mr. MacLean's incendiary allegations of "fraudulent transfers", Mr. Soule' informed the undersigned that he felt compelled to file a *Motion to Intervene* in this proceeding. Multigroup Claimants believes that it can satisfactorily establish the error of any stated concern by Mr. Soule', and as of a week ago, i.e., only two days after first speaking with Mr. Soule', the undersigned had already been informed that Mr. Soule's *Motion to Intervene* would most likely soon be withdrawn.²

² As Multigroup Claimants understands, Mr. Soule's delay in withdrawing his motion is a result of issues arising from the Coronavirus quarantine of his office. Notwithstanding, in an abundance of caution, Multigroup Claimants is submitting its opposition brief, which is due today.

CONCLUSION

Mr. Soule' is not an appropriate party to intervene in this near-completed proceeding. For the reasons set forth above, Mr. Soule's motion should be denied in its entirety.

Respectfully submitted,

Dated: April 10, 2020

_____/s/_____
Brian D. Boydston, Esq.
California State Bar No.155614

PICK & BOYDSTON, LLP
2288 Westwood Blvd., Ste. 212
Los Angeles, California 90064
Telephone: (424)293-0111
Email: brianb@ix.netcom.com

Attorneys for Multigroup Claimants

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of April, 2020, a copy of the foregoing was filed with the eCRB system, and therefore sent by electronic mail to the parties listed on the attached Service List.

_____/s/_____
Brian D. Boydston, Esq.

National Association of Broadcasters (NAB) aka CTV, represented by John Stewart, served via Electronic Service at jstewart@crowell.com.

MPAA-Represented Program Suppliers (MPAA), represented by Lucy H Plovnick, served via Electronic Service at lh@msk.com.

Canadian Claimants Group, represented by Victor J Cosentino, served via Electronic Service at victor.cosentino@larsongaston.com.

SESAC Performing Rights, LLC, represented by John C. Beiter, served via Electronic Service at john@beiterlaw.com.

Public Television Claimants (PTC), represented by Ronald G. Dove Jr., served via Electronic Service at rdove@cov.com

Joint Sports Claimants (JSC), represented by Ritchie T. Thomas, served via Electronic Service at ritchie.thomas@squirepb.com.

Settling Devotional Claimants (SDC), represented by Matthew MacLean, served via Electronic Service at matthew.maclea@pillsburylaw.com.

Steven Soule', Esq., via Electronic Service at ssoule@HallEstill.com.

EXHIBIT A

March 17, 2020

VIA EMAIL: Brianb@ix.netcom.com

Brian D. Boydston, Esq.
PICK & BOYDSTON, LLP
2288 Westwood Blvd., Ste. 212
Los Angeles, CA 90064

Re: Alfredo Carlos Paul Galaz and Lois May Galaz, Case No. 19-11098-R; United States Bankruptcy Court for the Northern District of Oklahoma

Dear Mr. Boydston:

I am the Chapter 7 bankruptcy trustee for the bankruptcy case of Alfredo Carlos Paul Galaz and Lois May Galaz. A copy of the Notice of Chapter 7 bankruptcy case is enclosed for your review. Please be advised that the bankruptcy estate may have an interest in the subject of the litigation styled In the Matter of Distribution of Cable Royalty Funds and In the Matter of Distribution of Satellite Royalty Funds, Case No. 14-CRB-0010-CD/SD 2010-2013 pending before the Copyright Royalty Judges of Washington, D.C., and the claims of your client, Multigroup Claimants. Please contact me at your earliest convenience to discuss further. I look forward to hearing from you.

Very truly yours,



Steven W. Soule

SWS:sam
Enclosures
cc: Katherine Vance, Assistant U.S. Trustee

4412675.1:733626:00120

Information to identify the case:

Debtor 1	Alfredo Carlos Paul Galaz	Social Security number or ITIN	xxx-xx-7195
	First Name Middle Name Last Name	EIN	__-____
Debtor 2	Lois May Galaz	Social Security number or ITIN	xxx-xx-7825
(Spouse, if filing)	First Name Middle Name Last Name	EIN	__-____
United States Bankruptcy Court Northern District of Oklahoma		Date case filed for chapter 7 5/28/19	
Case number: 19-11098-R			

Official Form 309A (For Individuals or Joint Debtors)**Notice of Chapter 7 Bankruptcy Case -- No Proof of Claim Deadline**

12/15

For the debtors listed above, a case has been filed under chapter 7 of the Bankruptcy Code.

An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtors or the debtors' property. For example, while the stay is in effect, creditors cannot sue, garnish wages, assert a deficiency, repossess property, or otherwise try to collect from the debtors. Creditors cannot demand repayment from debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although debtors can ask the court to extend or impose a stay.

The debtors are seeking a discharge. Creditors who assert that the debtors are not entitled to a discharge of any debts or who want to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadlines specified in this notice. (See line 9 for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at www.pacer.gov).

The staff of the bankruptcy clerk's office cannot give legal advice.

To help creditors correctly identify debtors, debtors submit full Social Security or Individual Taxpayer Identification Numbers, which may appear on a version of this notice. However, the full numbers must not appear on any document filed with the court.

Do not file this notice with any proof of claim or other filing in the case. Do not include more than the last four digits of a Social Security or Individual Taxpayer Identification Number in any document, including attachments, that you file with the court.

	About Debtor 1:	About Debtor 2:
1. Debtor's full name	Alfredo Carlos Paul Galaz	Lois May Galaz
2. All other names used in the last 8 years	aka Alfredo Raul Galaz, aka Alfred Galaz Jr., fdba Segundo Suenos LLC, fdba Worldwide Subsidy	
3. Address	3901 West Vandalia Street Broken Arrow, OK 74012	3901 West Vandalia Street Broken Arrow, OK 74012
4. Debtor's attorney Name and address	Ron D. Brown Brown Law Firm PC 715 S. Elgin Ave. Tulsa, OK 74120	Contact phone (918) 585-9500 Email: ron@ronbrownlaw.com
5. Bankruptcy trustee Name and address	Steven W. Soule Hall, Estill, Hardwick, Gable, etal 320 South Boston Avenue, Suite 200 Tulsa, OK 74103-3706	Contact phone 918-594-0466 Email: souletrustee@hallestill.com

For more information, see page 2 >

Debtor **Alfredo Carlos Paul Galaz and Lois May Galaz**Case number **19-11098-R**

6. Bankruptcy clerk's office Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at www.pacer.gov .	224 South Boulder Avenue, Room 105 Tulsa, OK 74103	Hours open: Monday, Wednesday, Thursday, Friday 8:30 a.m. to 4:30 p.m., Tuesday 8:30 a.m. to 3:00 p.m. Contact phone 918-699-4000 www.oknb.uscourts.gov
7. Meeting of creditors Debtors must attend the meeting to be questioned under oath. In a joint case, both spouses must attend. Creditors may attend, but are not required to do so.	June 25, 2019 at 02:00 PM The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.	Location: Room B04, 224 South Boulder Avenue, Tulsa, OK 74103
8. Presumption of abuse If the presumption of abuse arises, you may have the right to file a motion to dismiss the case under 11 U.S.C. § 707(b). Debtors may rebut the presumption by showing special circumstances.	The presumption of abuse does not arise.	
9. Deadlines The bankruptcy clerk's office must receive these documents and any required filing fee by the following deadlines.	<div> File by the deadline to object to discharge or to challenge whether certain debts are dischargeable: </div> <div> Filing deadline: 8/26/19 </div> <div> You must file a complaint: <ul style="list-style-type: none"> • if you assert that the debtor is not entitled to receive a discharge of any debts under any of the subdivisions of 11 U.S.C. § 727(a)(2) through (7), or • if you want to have a debt excepted from discharge under 11 U.S.C. § 523(a)(2), (4), or (6). </div> <div> You must file a motion: <ul style="list-style-type: none"> • if you assert that the discharge should be denied under § 727(a)(8) or (9). </div> <hr/> <div> Deadline to object to exemptions: </div> <div> The law permits debtors to keep certain property as exempt. If you believe that the law does not authorize an exemption claimed, you may file an objection. </div> <div> Filing deadline: 30 days after the conclusion of the meeting of creditors </div>	
10. Proof of claim Please do not file a proof of claim unless you receive a notice to do so.	No property appears to be available to pay creditors. Therefore, please do not file a proof of claim now. If it later appears that assets are available to pay creditors, the clerk will send you another notice telling you that you may file a proof of claim and stating the deadline.	
11. Creditors with a foreign address	If you are a creditor receiving a notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.	
12. Exempt property	The law allows debtors to keep certain property as exempt. Fully exempt property will not be sold and distributed to creditors. Debtors must file a list of property claimed as exempt. You may inspect that list at the bankruptcy clerk's office or online at www.pacer.gov . If you believe that the law does not authorize an exemption that the debtors claim, you may file an objection. The bankruptcy clerk's office must receive the objection by the deadline to object to exemptions in line 9.	

A Photo ID is required to enter the building. Weapons, including pocket knives, are not permitted in the building.

EXHIBIT B

RE: [EXTERNAL]:Re: Alfredo Carlos Paul Galaz and Lois May Galaz, Case No. 19-11098-R

From: SSoule@HallEstill.com
To: brianb@ix.netcom.com, SMcCormick@HallEstill.com
Cc: katherine.vance@usdoj.gov
Subject: RE: [EXTERNAL]:Re: Alfredo Carlos Paul Galaz and Lois May Galaz, Case No. 19-11098-R
Date: Mar 20, 2020 6:51 AM
Attachments: [image515b86.PNG](#)

Brian-Thank you for the email. Good luck getting back into the country. I will hold off on any formal action until we have had a chance to talk. Steve

	<p>STEVEN W. SOULE SHAREHOLDER AND DIRECTOR 320 S. Boston Ave. Suite 200 Tulsa, OK 74103 Office: 918-594-0466 Cell: 918-852-7262 Bio</p>
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This e-mail message and any attachment thereto is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the recipient or reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this e-mail communication in error, please notify us immediately by sending a reply e-mail message to the sender. Thank you.

From: Brian D. Boydston, Esq. [mailto:brianb@ix.netcom.com]
Sent: Friday, March 20, 2020 8:17 AM
To: Sherry McCormick <SMcCormick@HallEstill.com>
Cc: katherine.vance@usdoj.gov; Steve Soule <SSoule@HallEstill.com>
Subject: [EXTERNAL]:Re: Alfredo Carlos Paul Galaz and Lois May Galaz, Case No. 19-11098-R

Dear Mr. Soule'

I passed on your letter to my client, who passed it on to Alfred and Lois Galaz and their legal counsel. As I asked them to convey, I am currently quarantined in Peru until April 1, 2020, and would request that this matter be held at bay until I return and have all of my resources at hand (including reliable communications and the ability to communicate with my client).

To say the least, your letter came as a surprise to us. For a multitude of reasons of which I doubt you are aware, we wouldn't think that you (as the bankruptcy trustee for the Alfred and Lois Galaz bankruptcy) would have any interest in Multigroup Claimants' litigation, but obviously need to understand the basis of your statement that you may have an interest therein.

I can only presume from the timing of this matter, that the basis of your statement emanated from an attorney by the name of Matthew MacLean, representing a group of churches called the "Settling Devotional Claimants". The Settling Devotional Claimants are adverse to Multigroup Claimants in proceedings in Washington, D.C. (wherein Multigroup Claimants represents other churches), and Mr. MacLean's clear intention is to do his bidding by spurring you to assert a claim to Multigroup Claimants' royalties or interfere with its activities, the very nature of which would be for the purpose of either delaying significant distributions to Multigroup Claimants that are immediately due, or torpedoing them altogether. That is, the very action that he may encourage you to take would damage Multigroup Claimants and result in claims against it by the 250+ claimants it represents. The only beneficiary of such action, would be Mr. MacLean and the Settling Devotional Claimants.

Please appreciate that Mr. MacLean has made it a practice of alleging actionable conduct for all manner of innocent conduct. In fact, Multigroup Claimants is in the midst of legal briefing in the matters in Washington, D.C., and tallied that in the last few years Mr. MacLean has alleged "fraudulent" conduct by five current and former principals of Multigroup Claimants, two of its expert witnesses, and even myself, none of which have been found to have merit.

Given the sensitivity of this matter, I would ask (in fact, caution) you to not make any formal demands of any parties involved at this time, as the very act of doing so could irreparably harm Multigroup Claimants and any interest to which you may make claim.

Thanks, and I look forward to your response.

Brian Boydston

Counsel for Multigroup Claimants

-----Original Message-----

From: SMcCormick@HallEstill.com

Sent: Mar 17, 2020 3:04 PM

To: Brianb@ix.netcom.com

Cc: katherine.vance@usdoj.gov, SSoule@HallEstill.com

Subject: Alfredo Carlos Paul Galaz and Lois May Galaz, Case No. 19-11098-R

Mr. Boydston:

Please see the attached letter from Steven W. Soulé, Chapter 7 Trustee of the above-captioned bankruptcy case. Thank you.

Sherry McCormick

Secretary to Steven W. Soulé

Hall, Estill, Hardwick, Gable, Golden & Nelson, P.C.

320 South Boston Avenue, Suite 200

Tulsa, OK 74103-3706

(918) 594-0549

(918) 594-0505 (Facsimile)

smccormick@hallestill.com

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)
)
Distribution of)
Cable Royalty Funds)
)
In the Matter of)
)
Distribution of)
Satellite Royalty Funds)

CONSOLIDATED DOCKET NO.
14-CRB-0010-CD/SD
(2010-2013)

**ALFRED GALAZ DECLARATION IN SUPPORT OF
MULTIGROUP CLAIMANTS' OPPOSITION TO
STEVEN SOULE' MOTION TO INTERVENE**

I, ALFRED GALAZ, declare and state as follows:

1. I submit this declaration in support of Multigroup Claimants'

*Opposition to Steven Soule' Motion to Intervene and Delay Any Distribution to
Multigroup Claimants or Worldwide Subsidy Group LLC.* The following facts are
within my personal knowledge, and if called upon I could and would testify
competently thereto.

2. I have been provided a copy of Steven Soule's *Motion to Intervene
and Delay Any Distribution to Multigroup Claimants or Worldwide Subsidy Group
LLC.* Therein, Mr. Soule', the appointed bankruptcy trustee for my May 2019

**Multigroup Claimants' Opposition to Steven Soule'
Motion to Intervene and Delay Any Distribution to
Multigroup Claimants or Worldwide Subsidy Group LLC**

bankruptcy filing asserts that I “had not responded to multiple attempts” by him to contact me.

3. I have no idea to what Mr. Soule’ is referring. As a matter of record, I have always been represented by bankruptcy legal counsel, through whom Mr. Soule’ could communicate. At no time has my legal counsel indicated that Mr. Soule’ was trying to contact me, and that I needed to contact him.

4. Notwithstanding, on or about March 25, 2020, I received a letter from Mr. Soule’ in the mail. The letter was dated March 20, 2020, indicated that he understood that my bankruptcy legal counsel was no longer my counsel, and requested me to contact him. Despite the fact that I had just that day engaged different bankruptcy counsel, my prior counsel remained my counsel of record. As such, I am unaware why Mr. Soule’ would attempt to contact me directly. Moreover, even if this hadn’t been a prohibited attempt to reach me, i.e., by circumventing my legal counsel, it was the *only* attempt with which I was aware. Therefore, no basis existed for Mr. Soule’s statement to the Judges that he had tried to contact me on “multiple” occasions.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 10th day of April, 2020, at Tulsa, Oklahoma.


Alfred Galaz

Proof of Delivery

I hereby certify that on Friday, April 10, 2020, I provided a true and correct copy of the Multigroup Claimants' Opposition To Steven Soule' Motion To Intervene And Delay Any Distribution To Multigroup Claimants Or Worldwide Subsidy Group, Llc to the following:

Settling Devotional Claimants (SDC), represented by Michael A Warley, served via Electronic Service at michael.warley@pillsburylaw.com

Public Television Claimants (PTC), represented by Dustin Cho, served via Electronic Service at dcho@cov.com

Canadian Claimants Group, represented by Lawrence K Satterfield, served via Electronic Service at lksatterfield@satterfield-pllc.com

National Association of Broadcasters (NAB) aka CTV, represented by David J Ervin, served via Electronic Service at dervin@crowell.com

Soule, Steven, represented by Steven W Soule, served via Electronic Service at ssoule@hallestill.com

Joint Sports Claimants (JSC), represented by Michael S Laane, served via Electronic Service at sean.laane@apks.com

MPA-Represented Program Suppliers (MPA), represented by Alesha M Dominique, served via Electronic Service at amd@msk.com

Signed: /s/ Brian D Boydston